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Attorneys for GOOGLE LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

GOOGLE LLC,
Plaintiff,

vs.

SONOS, INC.,
Defendant

CASE NO. 3:20-cv-06754-WHA
Related to CASE NO. 3:21-cv-07559-WHA

GOOGLE'S ADMINISTRATIVE MOTION TO CONSIDER WHETHER ANOTHER PARTY'S MATERIAL SHOULD BE SEALED

1 **I. INTRODUCTION**

2 Pursuant to Civil Local Rule 79-5(f), Google LLC (“Google”) respectfully submits this
 3 Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed in
 4 connection with the parties’ Joint Discovery Letter regarding Topic No. 6 of Google’s Federal Rule
 5 of Civil Procedure 30(b)(6) Notice of Deposition to Sonos, Inc. (“Sonos”) (“Joint Discovery
 6 Letter”). Certain portions of the Joint Discovery Letter and documents filed in support thereof
 7 contain information that Sonos may consider confidential pursuant to the Stipulated Protective
 8 Order (“Protective Order”) entered by this Court. Dkt. 94. Accordingly, Google seeks to file under
 9 seal the documents and information as listed below:

Document	Portions to Be Filed Under Seal	Designating Party
Joint Discovery Letter	Portions highlighted in blue and green	Sonos
Joint Discovery Letter Exhibit 1 (“Exhibit 1”)	Portions highlighted in green	Sonos

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 15 Materials and documents may be provisionally filed under seal pursuant to Civil Local Rule
 16 79-5(f) when the document, or portions thereof, “has been designated as confidential by another
 17 party or non-party.” L.R. 79-5(f). Google has redacted the portions of the Joint Discovery Letter
 18 and submitted exhibits in support thereof highlighted in blue and green under seal because
 19 information therein may be considered “CONFIDENTIAL” and/or “HIGHLY CONFIDENTIAL—
 20 ATTORNEYS’ EYES ONLY” under the Protective Order by Sonos.

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1 In compliance with Civil Local Rule 79-5(d) and (e), unredacted versions of the above listed
2 documents accompany this Administrative Motion and redacted versions of the above listed
3 documents have been filed publicly. In accordance with Local Rule 79-5(c)(3), Google has also
4 filed a Proposed Order herewith.

6 || DATED: August 19, 2022

QUINN EMANUEL URQUHART & SULLIVAN,
LLP

By: /s/ Charles K. Verhoeven

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CERTIFICATE OF SERVICE

Pursuant to the Federal Rules of Civil Procedure and Local Rule 5-1, I hereby certify that, on August 19, 2022, all counsel of record who have appeared in this case are being served with a copy of the foregoing via the Court's CM/ECF system and email.

DATED: August 19, 2022

By: /s/ Charles K. Verhoeven
Charles K. Verhoeven